

March 24, 2023

*Via ECF Only*

Jones  
Law Firm P.C.

Hon. Jennifer L. Rochon  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: Discovery Dispute in *Coker v. Goldberg & Associates P.C.*  
*et al*, 1:21-cv-01803-JLR**

Dear Judge Rochon:

I am in receipt of Ms. Dodson's letter, dated March 21, 2023, and your Honor's order of March 22, 2023.

As Ms. Dodson's letter notes, her office reached out to Louis Lombardi, who is no longer with our firm, and Mr. Jones, who was unavailable at the time. No formal request was sent to me, the attorney who conducted the deposition of Defendant Julie Goldberg, with a final, formal list of requests.

As I only received this letter on March 21<sup>st</sup>, I am not in a position to provide the extensive list of requested documents on such short notice. Additionally, as the letter notes, at the time the letter was sent, we did not yet have the transcript for the full context of requests. I believe the transcript will also show that there were requests for which Defendants demanded additional time, as much as 30 days, to locate and prepare the requested documents. But, again, we did not receive the transcript, nor any formal request, at the time Ms. Dodson's letter was sent.

As to Ms. Goldberg's preparation for the 30(b)(6) topics, she testified truthfully to the extent of her knowledge and capability about those issues. If Plaintiff's counsel is unsatisfied with the depth of her

knowledge, they are free to serve us with a notice to take the deposition of additional witnesses.

Please note that we are not refusing to turn over any discovery materials and have no dispute as to the materials demanded at this time. Plaintiff's counsel has made extensive material demands that will take our office and the Defendant's office some time to coordinate and gather.

Respectfully,

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